

Gifts

Purpose

At AkzoNobel, we don't promise, offer, give or authorize anything of value, directly or through others, with the intent to improperly influence or reward a business decision. We each have a responsibility to make decisions in the company's best interest and to ensure that we base our dealings with business partners on objective decisions and are not influenced by Gifts.

These rules must be followed to ensure that we conduct business fairly, transparently and with integrity and in compliance with applicable laws and regulations as well as AkzoNobel's core values and standards. In case of conflict, the most stringent standard applies.

1 What is a Gift?

A Gift refers to any gift, gratuity, favors, benefit, or any tangible and intangible items having monetary value, for which fair market value is not paid by the recipient and does not involve the presence of an AkzoNobel employee.

2 What we cannot offer or receive as Gifts

- a. We do not promise, offer, give or authorize a Gift, directly or through others, with the intent to improperly influence or reward a business decision.
- b. We do not offer or receive Gifts, which are:
 - Cash or cash equivalents, irrespective of their value;
 - Not in accordance with [Precious Articles Rules & Procedures](#);
 - Excessive based on marketplace practices;
 - Lavish or extravagant;
 - Not in accordance with local law;
 - Likely to risk the safety of people or AkzoNobel's reputation;
 - To/from [\[1\] Government Officials](#).

3 Gifts to or from Relatives or personal relationships

We can offer or receive Gifts that are solely motivated by a family or personal relationship, subject to the Conflict of Interest Rules and Procedures, and completely unrelated to, and disconnected from, any business activity. However, we must not use our [\[2\] Relatives](#) or personal relationships, funds, or assets to circumvent these Gift Rules.

4 Definitions

[1] "Government Officials" are:

- an officer or employee of any government, department, agency, bureau, authority, or state-owned or state-controlled entity;
- acting in an official capacity for or on behalf of any government, department, agency, bureau, authority, or state-owned or state-controlled entity;
- an official, employee, or person acting on behalf of a government-sponsored or public international organization such as the European Union, the United Nations or the World Bank;
- holding a legislative, administrative, executive, or judicial position, whether appointed or elected; a political candidate, or
- an officer or employee of a political party; a member of a royal family; or a family member of, or otherwise closely associated (whether family or personal), with any of the foregoing.

[2] "Relatives" are any family member (whether through blood or adoptive/foster relationships or other legally recognized family like relationships) such as spouse, domestic partner, parent, grandparent, child, grandchild, sibling, in-law, aunt, uncle, niece, nephew, cousin, step-relatives; others residing in your household.